

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., <i>et al.</i> ¹ ,)	Case No. 01-01139 (JKF)
)	Jointly Administered
Debtors.)	
)	Exhibit A

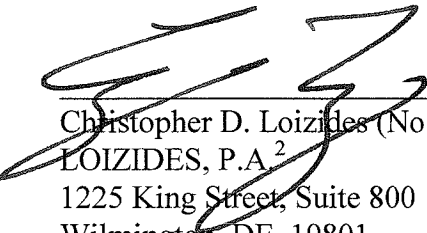
**CLAIMANTS' DEPOSITION DESIGNATIONS OF FACT
WITNESSES RELATING TO THE STATUTE OF LIMITATIONS
AND PRODUCT IDENTIFICATION ON BEHALF OF CERTAIN
ASBESTOS PROPERTY DAMAGE CLAIMANTS OF SPEIGHTS & RUNYAN**

Certain claimants represented by the law firm of Speights & Runyan, by and on behalf of Anderson Memorial Hospital ("Anderson") hereby submit the attached fact witness deposition designations with respect to the issues relating to the Statute of

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgracc, Inc., Coalgracc II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp, Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MICA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Curving, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Limitations and Product Identification issues as required by the Amended PD Case Management Order, Exhibit B, dated October 13, 2006 on behalf of all claimants.

DATED: March 13, 2007



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² Name change pending.

DEPOSITION DESIGNATION OF
KENNETH MILLIAN

Deposition of KENNETH MILLIAN given in Blue Cross and Blue Shield of
South Carolina v. W.R. Grace & Co. on February 21, 1990, as follows:

<u>Page</u>	<u>Line</u>
5	19 thru
8	04
11	25 thru
13	07; 23 thru
16	05
17	17 thru
18	12
19	08-11;22-25
26	11-16
27	07-10
28	07-13
30	06 thru
31	13
32	13-21
33	06 (and Plaintiff's Ex. 3) thru
34	21
36	08-22 (and Plaintiff's Ex. 4)
37	15-22
75	25 thru
76	07
91	15 thru
92	02; 18 Thru
94	17
97	10 thru
98	19
106	24 thru
107	07 (and Plaintiff's Ex. 8); 12 thru
108	09
123	05 thru (and Plaintiff's Ex. 12)
124	06
173	03 thru
174	22
176	07-17 (and Plaintiff's Ex. 18-593-597)

DEPOSITION DESIGNATION OF
KENNETH MILLIAN

Deposition of KENNETH MILLIAN given in Blue Cross and Blue Shield of
South Carolina v. W.R. Grace & Co. on October 26, 1990, as follows:

<u>Page</u>	<u>Line</u>
3	07 thru
5	06
5	24 thru
7	07
14	02-17
15	09-18
20	02 thru
22	18
23	23 thru
24	14

All of the exhibits encompassed within those designations.

DEPOSITION DESIGNATION OF
CAROLYN TIEGER

Deposition of CAROLYN TIEGER given In Re: Asbestos School Litigation v.

W.R. Grace & Co. on November 29, 1988, as follows:

<u>Page</u>	<u>Line</u>
5	01-17
9	04-21
10	13 thru
11	20
12	12 thru
13	12
21	18 thru
23	03
24	03-05
31	05 thru
33	04
33	06-20
34	09 thru
35	07
36	09 thru
40	23
41	11 thru
42	17
42	23 thru
46	04
47	04-09
48	18 thru
51	01
52	18 thru
53	21
54	18 thru
55	13
58	12-23
59	05-11
60	05 thru
70	10
72	16 thru
74	08
84	23 thru
86	07
88	03-23

91	01-22
97	03 thru
98	12
98	13 thru
99	20
100	22 thru
101	23
102	22 thru
104	02
106	03 thru
108	13
109	06 thru
110	13
111	10 thru
112	09
113	11 thru
114	14
115	15 thru
116	08
117	12-22
118	23 thru
119	17
120	01-08
120	12 thru
121	07
121	11 thru
130	15
133	03 thru
136	19
138	20 thru
144	15

Also Deposition exhibits that fall within those #'s

DEPOSITION DESIGNATION OF
JOHN FREDERICK WELCH

Deposition of JOHN FREDERICK WELCH given In Re: Asbestos School

Litigation v. W.R. Grace & Co. on November 17, 1988, as follows:

<u>Page</u>	<u>Line</u>
4	08-21
7	09 thru
8	04
9	12 thru
10	05
11	09-21
12	11-13
13	06-09
23	21 thru
24	03
26	07 thru
27	04; 08-13; 22 thru
28	16
31	13-15
32	21 thru
33	01; 09-13; 17-19
35	20-23
45	21 thru
46	13
47	12 thru
48	23
50	03-11
53	03-06
127	23 thru
132	20
136	01 thru
137	07
142	16 thru
146	17
152	05 thru
153	18
164	02 thru
165	17

DEPOSITION DESIGNATION OF
ROBERT BEDER

Deposition of ROBERT BEDER given in Connecticut Mutual Life Insurance v.
W.R. Grace & Co. on May 22, 1995 as follows:

<u>Page</u>	<u>Line</u>
4	07 thru page 7, line 22
142	05 thru page 143, line 03

DEPOSITION DESIGNATION OF
HAROLD BISHOP

Deposition of HAROLD BISHOP given in State Farm Mutual Automobile Insurance Company v. W.R. Grace & Co., on May 13, 1992, as follows:

<u>Page</u>	<u>Line</u>
8	04-10
13	13-24
17	05-10
18	02-09
23	12-19
25	09-15
37	12-14
38	06-07
40	16-21
56	06-10
63	06-24
65	16-20
73	20-24
74	01
76	02-05, 11-17
86	21-24
87	01-24
88	01-16
99	01-12
101	21-24
102	01-10
103	23-24
104	01, 05-13, 23-24
105	01-03

DEPOSITION DESIGNATION OF
ELIJAH DAVID BOSSIER

Deposition of ELIJAH DAVID BOSSIER given in Security Homestead Association

v. W.R. Grace & Co., on June 15, 1989, as follows:

<u>Page</u>	<u>Line</u>
4	13-25
5	01-06
8	24-25
9	01-11; 17-25
10	03-09
16	16-25
17	01; 16-25
18	01-06
27	15-25
28	01-25
29	01
72	04-25
73	01-25
74	01-07; 12-17
75	01-03; 07-25
76	01-09
78	22-25
80	13-19

DEPOSITION DESIGNATION OF
GLEN CARPENTER

Designation of pages and line numbers to be read from the deposition of **GLEN CARPENTER** taken in the case of Jeannine A. Galbreath, etc. v. United States Gypsum Company, et al., on September 21, 1987, as follows:

<u>PAGE(S)</u>	<u>LINE(S)</u>
3	9 - 25
4	1
6	15 (... I want to get) thru
7	9
10	22 - 23
11	21 (... But just for) thru
12	18
14	19 thru
16	9; 15 thru
17	7; 16 thru
18	10; 13 thru
19	16
20	21 thru
21	3; 13 thru
25	7
26	21 (... Do you) - 25
27	3 thru
28	15
29	5 - 11; 17 thru
30	11; 16 thru
32	11
33	8 - 10
42	7 - 9; 12 - 19
43	7 - 15
44	20 - 23
45	13 thru
47	2; 6 - 10
54	22 thru
55	3; 10 - 21
56	19 thru
57	1
59	22 thru
60	1

61	2 thru
62	22

DEPOSITION DESIGNATION OF
RICHARD CONNOR

Deposition of RICHARD CONNOR given in Cheshire Medical Center v. W.R.

Grace & Co. on July 10, 1990, as follows:

<u>Page</u>	<u>Line</u>
5	06-23
6	22-23
7	01 thru Page 12, line 03
15	14-23
16	01-27
17	01-03
21	21-23
22	01-02
23	01-17
44	14-23
45	01-03
126	05-09
126	20-23
127	01-11
183	11-16
184	04-08
184	15-18

DEPOSITION DESIGNATION OF
CREIGHTON CROWE

Deposition testimony of Creighton Crowe taken on September 3, 1992, in The First Savings Bank, F.S.B., Successor in Interest to First Federal Savings and Loan Association of South Carolina v. W.R. Grace & Co. - Conn. C/A No. 6:91-2591-20, as follows:

<u>Page</u>	<u>Line</u>
5	06 - 08; 22 through page 06, line 23
7	07 through page 21, line 01
38	15 through page 39, line 17
39	25 through page 40, line 19
43	13 - 21

DEPOSITION DESIGNATION OF
HAL GARRETT

Deposition of HAL GARRETT given in Liberty Life Insurance
Company v. W.R. Grace & Co. & W.R. Grace & Co.-Conn., on June 2,

1989, as follows:

<u>Page</u>	<u>Line</u>
1	15-16; 19-25
2	01-05; 12-22
3	16-19
7	12-14
10	16-22
11	05-25
12	01-02; 08-13
18	04-08
19	22-25
20	01-17
22	20-25
23	01-09

DEPOSITION DESIGNATION OF
CHARLES WILLIAM GUENTHER

Deposition of CHARLES WILLIAM GUENTHER given in Clayton

Center Associates v. W.R. Grace & Co., on September 12, 1989, as

follows:

<u>Page</u>	<u>Line</u>
4	09-25
5	01-07
7	03-08; 25
8	01-12
9	22-25
10	01-25
11	01-03
18	24-25
19	01-25
20	01-25
21	01-25
22	01-03
24	06-15
25	03-19
26	02-16
48	22-25
49	01-05
51	13-20

DEPOSITION DESIGNATION OF
ROSS LEE

Deposition of ROSS LEE given in Los Angeles Unified School District v. Owens-
Corning Fiberglas Corp., et al., on February 21, 1992, as follows:

<u>Page</u>	<u>Line</u>
5	10-12; 16-19
7	12-25
8	01-15
11	01-05; 22-25
12	01-08
14	03-10
17	04-10; 24-25
18	01-04
25	24-25
26	01-20
30	24-25
31	01-25
32	01-25
33	01-04; 08-10; 12; 14-17
35	02-03; 08-09; 19-21
36	01-02
61	13-25
62	01-04

DEPOSITION DESIGNATION OF
P. J. LYONS

Deposition of P. J. LYONS given in State Farm Mutual Automobile Insurance Co. v.

W.R. Grace, on May 19, 1992, as follows:

<u>Page</u>	<u>Line</u>
5	15-21
6	16-22
8	09-12
20	14-24
21	01-03
37	23-24
38	01-19
39	03-20
44	22-23
45	09-16
73	21-24
74	01
74	08-17
74	20-24
75	01-24
76	01-05
78	18-21
81	17-24
126	07-24
127	15-24
128	01-09
133	02-08
150	17-23
155	02-15
208	24
209	01-11

DEPOSITION DESIGNATION OF
ROBERT H. RITTERBUSH

Deposition of ROBERT H. RITTERBUSH given in Montana-Dakota Utilities
Co. v. W.R. Grace & Co. and W. R. Grace & Co.-Conn. December 13, 1990, as follows:

<u>Page</u>	<u>Line</u>
4	23 thru page 7,line 6
8	17 thru page 9 ,line 10
40	13-25

DEPOSITION DESIGNATION OF
SAMUEL LEE TEMPLETON

Deposition of SAMUEL LEE TEMPLETON given in Greenville County School
District v. United States Gypsum Company, W.R. Grace Co., National Gypsum Co. and Proko
Industries, Inc., on January 4, 1984 as follows:

<u>Page</u>	<u>Line</u>
4	06-17
6	13-24
7	07-19
21	18-24
34	09-19
58	18-22
65	18-25
66	01-25
67	01-12
68	20-25
69	01-03
149	01-03
150	01-12
196	18-25
197	01-15
197	22-25
198	01-18
233	14-25
234	01-19

DEPOSITION DESIGNATION OF
CARTER WATSON

Deposition of CARTER WATSON taken on September 25, 1992, in R. Gordon
Matthews, et al. v. Fluor Corp., et al., U.S.D.C., District of South Carolina, Greenville Division, C/A
No. 6:89-1738-13, as follows:

<u>PAGE</u>	<u>LINE(S)</u>
4	23 - 25
5	01 - 13; 15 - 25
6	01 - 25
7	01 - 25
8	01 - 25
9	01 - 25
10	01 - 25
11	01; 05
13	25
14	01 - 05
21	24 - 25
22	01 - 10